IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

| In re: FOAMEX INTERNATIONAL, INC., et al. | |
|---|---|
| GUNGOR M. SOLMAZ, et al., |) Civil Action No. 07-364 |
| Appellants |) |
| v. |) |
| FOAMEX INTERNATIONAL, INC., et al., |) Bankruptcy Case No. 05-121685) AP 07-65 |
| Appellees | ý |

JOINT MOTION FOR EXTENSION OF BRIEFING DEADLINES

Come now the Appellants, Gungor M. Solmaz and Diana M. Solmaz, and the Appellees, Foamex International, Inc., et al., by and through their respective counsel, and hereby move for an extension of the briefing deadline in this appeal. In support thereof, the parties respectfully state as follows:

Appellants' opening brief is currently due on July 8, 2007, Appellees' answering brief is currently due on August 7, 2007, Appellants' reply brief is currently due on August 22, 2007.

As grounds for their Motion, the parties state that they have reached a settlement of the issues raised by the appeal which settlement is subject to approval by the Bankruptcy Court.

Accordingly, the parties request that the deadline for filing Appellants' opening brief be extended to September 7, 2007, the deadline for filing Appellees' answering brief be extended to October 8, 2007, and the deadline for filing Appellants' reply brief be extended to October 23, 2007.

TAYLOR LLP

Pauline K. Morgan (No. 3650) Joseph M. Barry (No. 4221) Kerneth J. Enos (No. 4544) 1000 West Street, 17th Floor P.O. Box 391 Wilmington, DE 19899-0391 (302) 571-6705

Attorneys for Appellees, Foamex International, Inc., et al.,

ECKERT SEAMANS CHERIN &

MELLOTT, LLC

Michael G. Busenkell, Esquire (No. 3933) 300 Delaware Avenue, Suite 1210 Wilmington, DE 19801 (302) 425-0430

Page 2 of 3

Attorney for Appellants, Gungor M. Solmaz and Diana M. Solmaz

U0007744

CERTIFICATE OF SERVICE

I, Michael G. Busenkell, certify that on July 11, 2007, I caused copies of the foregoing Joint Motion For Extension Of Briefing Deadlines to be served by hand on:

Kenneth J. Enos, Esquire Young Conaway Stargatt & Taylor LLP 1000 West Street, 17th Floor Wilmington, DE 19801

Michael G. Busenkell (No. 3933)

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

| In re: FOAMEX INTERNATIONAL, INC., et al. | |
|---|--|
| GUNGOR M. SOLMAZ, et al., |) Civil Action No. 07-364 |
| Appellants |) |
| v. |)) |
| FOAMEX INTERNATIONAL, INC., et al., |) Bankruptcy Case No. 05-121685) AP 07-65 |
| Appellees |) |
| AGREED ORDER FOR EXT | TENSION OF BRIEFING SCHEDULE |
| The court, having revie | wed the Joint Motion For Extension Of Briefing |
| Deadlines, having heard no objection t | o same, and being otherwise sufficiently advised, |
| hereby ORDERS that the briefing dead | lines are extended as follow: Appellant's opening |
| brief will be due on September 7, 20 | 007 Appellee's answering brief shall be due on |
| October 8, 2007, and Appellant's reply | brief shall be due on October 23, 2007. |
| Dated: | |
| | |
| | |

J.